

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

JUSTIN BLAKE,

Plaintiff,

v.

Case No. 22-CV-970

DAVID BETH in his individual capacity and official
capacity,
COUNTY OF KENOSHA a municipal corporation,
KYLE BISSONNETTE in his official capacity,
JACOB DiCELLO in his official capacity,
GLORIA GALVAN in her official capacity,
DEREEMEYUN HAYNES in his official capacity
JEREMY MAY in his official capacity,
JESSICA BERGMANN in her individual and official capacity,
VISITING NURSE CARE, INC.,
KENOSHA VISITING NURSE ASSOCIATION,
JOHN DOE OFFICERS in the Kenosha County
Sheriff's Department 1-10,
JANE DOE MEDICAL PROFESSIONALS in their
individual and official capacities
WISCONSIN COUNTY MUTUAL INSURANCE
COMPANY, and
ABC INSURANCE COMPANY,

Defendants.

**DEFENDANTS, DAVID G. BETH, COUNTY OF KENOSHA, KYLE BISSONNETTE,
JACOB DICELLO, GLORIA GALVAN, DEREEMEYUN HAYNES AND JEREMY
MAY'S RESPONSE TO PLAINTIFF'S FIFTH REQUESTS FOR PRODUCTION AND
SECOND SET OF INTERROGATORIES**

To: Justin Blake
c/o Mr. Nathaniel Cade, Jr.
Cade Law LLC
P. O. Box 170887
Milwaukee, WI 53217
--Attorneys for Plaintiff

Defendants, David G. Beth, County of Kenosha, Kyle Bissonnette, Jacob DiCello, Gloria Galvan, Dereemeyun Haynes and Jeremy May, by their attorneys, Crivello, Nichols & Hall, S.C., and for their Response to Justin Blake's Fifth Requests for Production and Second Interrogatories, dated October 24, 2023, state as follows:

INTERROGATORY

INTERROGATORY NO. 2 KENOSHA COUNTY: What are the full names, hours of work, badge numbers, employment title, specific date(s) of work, and the work locations of persons who reported to work for the Kenosha County Sheriff's Department on April 25, 2021 and April 26, 2021.

RESPONSE: Defendants object to Interrogatory No. 2 on the basis it is impermissibly broad and overly vague, and unduly burdensome. Subject to and without waiving said objections, between 8:00 a.m. on April 25, 2021, and 10:00 a.m. on April 26, 2021, the following correctional employees reported for work:

Correctional Officers:

- a. Andrew Abbott. Employed since 06/13/2017.
- b. Anthony Molinaro. Employed since 09/14/1999.
- c. Billy Cameron. Employed since 07/15/1997.
- d. Cory McDannel. Employed from 11/27/2017 to 09/22/2022.
- e. Chad Loesch. Employed since 09/09/2019.
- f. Craig Knecht. Employed since 01/21/2009.
- g. Debra Shimkus. Employed from 03/16/2021 to 11/01/2022.

- h. Dereemeyun Haynes. Employed since 05/07/2014.**
- i. Francisco Santos. Employed from 01/06/2020 to 08/17/2021.**
- j. Franklin Shelby. Employed from 08/31/2016 to 07/01/2021.**
- k. Gloria Galvan. Employed since 03/18/2018.**
- l. Heather Smith. Employed from 11/29/2016 to 09/09/2022.**
- m. Heidi Wenburg. Employed from 04/24/2007 to 07/30/2022.**
- n. Jacob Dicello. Employed since 11/14/2018.**
- o. James Bosas. Employed since 04/30/2018.**
- p. Janetta Seepanski. Employed since 07/11/2000.**
- q. Jeremy Preischel. Employed since 05/29/2019.**
- r. Joseph Fazzari. Employed from 05/14/2013 to 06/05/2021.**
- s. Kaelan Aker. Employed since 10/06/2020.**
- t. Melissa Ishee. Employed since 01/19/2013.**
- u. Micael Holterman. Employed since 02/08/2017.**
- v. Monica Hoff. Employed since 08/24/2004.**
- w. Nathan Knautz. Employed since 11/06/2007.**
- x. Rhona Moore. Employed since 08/09/2019.**
- y. Scott Dahl. Employed since 02/20/2001.**
- z. Shawn Bogdala. Employed since 06/13/2017.**
- aa. Stephanie Kohnke. Employed from 06/13/2017 to 10/24/2021.**
- bb. Thomas Corrao. Employed from 06/17/1996 to 11/15/2021.**

cc. Zaide Estrada. Employed since 02/05/2020.

Correctional Sergeants:

- a. Brian Doe. Employed since 11/08/2004.
- b. Bryan Bernhardt. Employed since 09/07/1993.
- c. James Parker. Employed since 12/02/2008.
- d. Jeremy May. Employed since 01/28/2019.

Correctional Corporals:

- a. Daniel Naef. Employed since 06/19/1996.
- b. Denise Jarvela. Employed since 01/30/1998.
- c. Dirk MacDonald. Employed since 07/13/1998.
- d. Pablo Martini. Employed from 01/05/2020 to 09/10/2022.

Lieutenant/Facility Administrator:

- a. Neil Paulsen. Employed since 02/06/2003.

Recruit Officer:

- a. Zacharias Walden. Employed from 04/12/2021 to 04/29/2021.

Admission and Release Specialists:

- a. Angelita Schroeder. Employed since 03/05/2002.
- b. Rachel Bellaire. Employed from 10/28/2014 to 12/16/2021.
- c. Kassie Street. Employed since 02/16/2022.
- d. Jeanette Dahl. Employed from 09/04/2001-09/09/2022.
- e. Erin Silverstein. Employed since 11/17/2020.

- f. Yesca Olsen. Employed from 09/10/2018 to 07/25/2022.
- g. Trisha Colbert. Employed since 05/15/2017.
- h. Dana Anderson. Employed from 03/06/2017 to 08/28/2022.
- i. Phyllis Erickson. Employed since 07/15/2019.

Admission and Release Supervisor:

- a. Andrew Orth. Employed since 03/20/2007.

Detention System Manager:

- a. Jill O'Hanlon. Employed since 01/15/2001.

Additionally, among others, the following law enforcement officers reported to work during the above-mentioned dates and times:

- a. Deputy Kyle Bissonnette. Employed since 08/23/2018.
- b. Deputy Allison George. Employed since 01/05/2017.
- c. Deputy Brian Koschnitze. Employed since 01/07/2019.
- d. Deputy Julia Macnl. Employed since 01/07/2019.
- e. Sergeant Michael Pittsley. Employed since 07/07/2017.

These individuals constitute law enforcement officers identified in any and all reports related to the subject arrest.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 43: As to Kenosha County, please provide the names, badge numbers, and corresponding photographs of all persons who were employed with the Kenosha County Sherriff Department as law enforcement officers from April 24, 2021 through April 30, 2021.

RESPONSE: Defendants object to Request No. 43 on the basis it is impermissibly broad and overly vague, and unduly burdensome. Defendants further object on the basis it is not reasonably calculated to lead to relevant information. Subject to and without waiving said objections, see bates labeled documents 000268-000273.

REQUEST NO. 44: As to Kenosha County, please provide the names and corresponding photographs of all persons employed with the Kenosha County Sherriff 's Department personnel from April 24, 2021 through April 30, 2021.

RESPONSE: Defendants object to Request No. 44 on the basis it is impermissibly broad and unduly vague. Defendants further object on the basis it is not reasonably calculated to lead to relevant information. Subject to and without waiving said objections, see bates labeled documents 000268-000273.

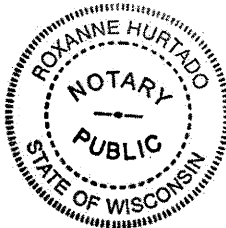
Dated this 11 day of January, 2023.

By:

Agt. Douglas J. Senger #11412
REPRESENTATIVE FOR COUNTY
DEFENDANTS

Subscribed and sworn to before
Me this 11 day of January, 2023

Roxanne Hurtado
Notary Public, State of Wisconsin
My Commission: 4/24/2026



Dated this 15th day of Jan, 2024

By: 

SAMUEL C. HALL, JR.

State Bar No. 1045476

STEVEN C. MCGAVER

State Bar No. 1051898

BRIANNA J. MEYER

State Bar No. 1098293

Attorneys for Defendants, David G. Beth,
County of Kenosha; Kyle Bissónnette, Jacob
DiCello, Gloria Galvan, Dereemeyun Haynes
and Jeremy May

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